



BY ECF

The Honorable Philip M. Halpern
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application granted. The status conference is adjourned to December 14, 2023 at 11:30 a.m. It is the Government's responsibility to have the defendant produced to Courtroom 520 at that time. The Government's application to exclude time under the Speedy Trial Act until December 14, 2023 is granted, on consent of defendant, in the interest of justice, to allow the parties to propound and review discovery, discuss possible pre-trial resolution, and for the effective preparation of subsequent matters herein.

SO ORDERED.

A handwritten signature in black ink, appearing to read "PMH".

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
September 11, 2023

Re: ***United States v. Justin Turnick, 23 Cr. 344 (PMH)***

Dear Judge Halpern:

A status conference in the above-captioned case is currently scheduled for September 14, 2023 at 9 a.m. The Government respectfully writes, with the consent of the defendant, to request an adjournment of that conference. As the Court is aware, the parties were last before the Court on July 12, 2023 for an initial conference. Since that appearance, the Government has made a substantial production of Rule 16 discovery and anticipates producing additional Rule 16 discovery in the coming weeks. Based on this, the parties believe that an adjournment of the conference for sixty days will serve the ends of justice and conserve judicial resources as the parties continue to review discovery and discuss a potential pretrial resolution. In the event an adjournment is granted, and to aid in scheduling the next conference, defense counsel asked the Government to relay that defense counsel is unavailable from November 17, 2023 – December 1, 2023.

Should the Court grant the adjournment, the Government further respectfully requests, without objection from the defendant, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from September 14, 2023 through the date of the rescheduled conference to allow defense counsel time to review the discovery and consult with the defendant, and so that the parties may engage in plea discussions. The ends of justice served by the granting of the continuance requested outweigh the interests of the public and defendant in a speedy trial.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/

Ryan Allison / Kathryn Wheelock
Assistant United States Attorneys
Southern District of New York
(914) 993-1953 / -1966

cc: Counsel of Record (by CM/ECF)